

201-14839

November 11, 2003

Michael O. Leavitt, Administrator
U.S. Environmental Protection Agency
Ariel Rios Building (1101A)
1200 Pennsylvania Ave., NW
Washington, DC 20460



PEOPLE FOR THE ETHICAL
TREATMENT OF ANIMALS

HEADQUARTERS
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Re: Comments on the HPV test plan for dimethyl 1,4-cyclohexanedicarboxylate (DMCD)

Dear Administrator Leavitt:

The following comments are on the test plan for DMCD (CAS no. 94-60-0), prepared by Eastman Chemical Co. These comments are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the USA, the Doris Day Animal League, and Earth Island Institute. These health, animal-protection and environmental organizations have a combined membership of more than ten million Americans.

Eastman has presented a great deal of data in the test plan and attached summaries from previous studies carried out both by itself and other organizations. On the basis of these data, Eastman has appropriately concluded that no additional testing is required under the high production volume chemical-testing program.

Eastman is to be particularly commended for applying an important, but often disregarded, principle formulated by the EPA in 1999 in a letter to manufacturers and importers (Wayland, S.H., Oct. 4, <http://www.epa.gov/chemrtk/ceoltr2.htm>), and reiterated in the *Federal Register* ("Data collection and development on HPV chemicals," Vol. 65, No. 248, Dec. 26, p. 81691) in 2000:

Participants shall maximize the use of scientifically appropriate categories of related chemicals and structure activity relationships.

Eastman has used data from structural surrogates where data for the test compound were unavailable. For example, it has used data from 1,4-cyclohexanedicarboxylic acid for repeat-dose and genetic toxicity endpoints, and data from the trans-isomer of DMCD (CAS no. 94-60-0 is a mixture of the trans- and cis-isomers) for the fish toxicity endpoint.

We are aware that methanol toxicity is a factor of DMCD metabolism in addition to any toxicity due to the cyclohexane component. However, methanol toxicity is extremely well understood, and Eastman should therefore have no difficulty in predicting the toxicity due to DMCD-derived methanol if it considers this to be important.

Thank you for your attention to these comments. I can be reached at 757-622-7382, extension 1304, or via e-mail at JessicaS@PETA.org.

Sincerely,

Jessica Sandler
Federal Agency Liaison

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